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MCGUIRE AND HESTER  
9

10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 In re: ) Bankruptcy Case  
14 ) No. 19-30088 (DM)  
15 PG&E CORPORATION, )  
16 -and- ) Chapter 11  
17 ) (Lead Case)  
18 PACIFIC GAS AND ELECTRIC ) (Jointly Administered)  
COMPANY, )  
19 Debtors. )

20 **MCGUIRE AND HESTER'S**  
21 **NOTICE OF PERFECTION OF LIEN**  
(11 USC §§ 546 and 362)

22 TO THE CLERK OF THE BANKRUPTCY COURT, THE DEBTORS, AND ALL OTHER  
23 INTERESTED PARTIES, AND THEIR ATTORNEYS OF RECORD:

24 You are hereby notified that McGuire and Hester (hereinafter "MH") hereby perfects and  
25 continues to perfect, under 11 United States Code Sections 546(b) and 362(b)(3), its mechanic's  
26 lien in the principal amount, after deducting all credits and offsets, of \$81,969.20, for labor,  
27 equipment, material, and services provided by MH, generally described as earthwork including  
28

1 excavation, import, AC paving, and underground utilities incorporated in and constituting  
2 improvements to the real property commonly known as 4940 Allison Parkway, Vacaville,  
3 California 95688. The purported owner of the property in question is Pacific Gas and Electric  
4 Company, 77 Beale Street, San Francisco, California 94105 and P.O. Box 997300, Sacramento,  
5 California 95899. MH furnished the above-described labor, equipment, materials and services at  
6 the special instance and request of, and pursuant to a contract with, Turner Construction  
7 Company, 1211 H Street, Sacramento, California 95814. This Notice constitutes the legal  
8 equivalent of having recorded a mechanic's lien and then having commenced a suit to foreclose  
9 upon the mechanic's lien. A true and correct copy of MH's mechanic's lien is attached hereto as  
10 **Exhibit A.**

11 You are further notified that MH intends to enforce the lien to the fullest extent allowed  
12 by bankruptcy law and California law. This pleading does not constitute an admission as to the  
13 necessity of any such seizure or commencement.

14 Dated: April 4, 2019

LEONIDOU & ROSIN  
Professional Corporation

17 By /s/ A. Robert Rosin  
A. Robert Rosin  
Attorneys for McGuire and Hester

# EXHIBIT A

Recording Requested By:

McGuire and Hester

When Recorded Mail To Claimant at:

Name McGuire and Hester

Street 2810 Harbor Bay

Address Parkway

City & State, Zip Alameda, CA 94502

Recorded in Official Records of Solano County

Marc C. Tonnesen

Assessor/Recorder

McGuire & Hester

Doc # 201900014350



Title: 1 Pages: 3  
Fees \$37.00  
Taxes \$0.00  
Other \$75.00  
Paid \$112.00

SPACE ABOVE THIS LINE FOR RECORDERS USE

### CLAIM OF MECHANICS LIEN

(CA Civil Code § 8400 et seq)

THE UNDERSIGNED CLAIMANT, MCGUIRE AND HESTER (correct full name as on contractor's license, if applicable or records of Secretary of State), CLAIMS A LIEN FOR LABOR, SERVICES, EQUIPMENT, AND/OR MATERIALS UNDER CALIFORNIA CIVIL CODE SECTION 8416 ET SEQ., UPON THE PREMISES HEREINAFTER DESCRIBED, AND UPON EVERY ESTATE OR INTEREST IN SUCH STRUCTURES, IMPROVEMENTS AND PREMISES HELD BY ANY PARTY HOLDING ANY ESTATE THEREIN.

THE LABOR, SERVICES, EQUIPMENT, AND/OR MATERIALS, WERE FURNISHED FOR THE CONSTRUCTION OF THOSE CERTAIN BUILDINGS, IMPROVEMENTS, OR STRUCTURES, NOW UPON THAT CERTAIN PARCEL OF LAND SITUATED IN THE COUNTY OF SOLANO STATE OF CALIFORNIA, SAID LAND DESCRIBED AS FOLLOWS:

Address: 4940 ALLISON PARKWAY, VACAVILLE, CA 95688

and/or Sufficient Description: PG&E VCOC BUILDING 1 EXPANSION

THE MECHANICS LIEN IS CLAIMED FOR THE FOLLOWING GENERALLY DESCRIBED WORK, LABOR, SERVICES, EQUIPMENT OR MATERIALS:

Description: EARTHWORK INCLUDING EXCAVATION, IMPORT, AC PAVING AND UNDERGROUND UTILITIES.

THE SUM OF \$ 81,969.20, TOGETHER WITH INTEREST THEREON AT THE RATE OF 2 PERCENT PER MONTH FROM 1.31.2019 (date when balance became due), IS DUE CLAIMANT, AFTER DEDUCTING ALL JUST CREDITS AND OFFSETS, FOR THE LABOR, SERVICES, EQUIPMENT, AND/OR MATERIALS FURNISHED BY CLAIMANT.

CLAIMANT FURNISHED THE LABOR, SERVICES, EQUIPMENT, AND/OR MATERIALS, AT THE REQUEST OF, OR UNDER CONTRACT WITH:

Name: TURNER CONSTRUCTION COMPANY

Address: 1211 H STREET, SACRAMENTO, CA 95817

THE OWNER(S) OR REPUTED OWNER(S) OF SAID PREMISES IS/ARE:

Name: PACIFIC GAS AND ELECTRIC COMPANY

Address: 77 BEALE STREET, SAN FRANCISCO, CA 94105 & PO BOX 997300, SACRAMENTO, CA 95896

DATE: 3.8.2019

NAME OF CLAIMANT: McGuire and Hester  
(Claimant Name)

BY: Kimberly L. Carone  
(Signature of Claimant or Authorized Agent)

### VERIFICATION

I, Kimberly S. Carone, state: I am the Secretary ("Owner of", "President of", "Authorized Agent of", "Partner of", etc.) the claimant named in the foregoing Mechanics Lien. I have read said Mechanics Lien and know the contents thereof; the same is true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 8, 2019 (date), at Alameda (City), CA (State).

Kimberly L. Carone  
(Signature of Claimant or Authorized Agent)

## **NOTICE OF MECHANICS LIEN**

### **ATTENTION!**

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the Mechanics Lien is released.

**BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEBSITE AT [www.cslb.ca.gov](http://www.cslb.ca.gov).**

Please complete and sign at least one (1) of the following proofs of service and record it along with this 3-page Mechanics Lien: Always attempt to serve the owner or reputed owner. Per California Civil Code § 8416 (c)(2) you must use the "ALTERNATIVE PROOF OF SERVICE AFFIDAVIT" if the owner or reputed owner cannot be served under Civil Code Section 8416(c)(1). Note: There is no prohibition from using both proof of service affidavits and serving both the owner/reputed owner as well as the construction lender and/or original contractor.

**PROOF OF SERVICE AFFIDAVIT**  
California Civil Code Section 8416 (a)(7), (c)(1)

I, Shawna K. Olgin, declare that I served a copy of the enclosed MECHANICS LIEN and NOTICE OF MECHANICS LIEN by Registered Mail, Certified Mail, or First Class Mail, evidenced by a certificate of mailing, postage prepaid, addressed to the following owner or reputed owner of the property Pacific Gas & Electric Company  
(Name and title or capacity of person or entity served)  
at the following address: 77 Beale St., San Francisco, CA 94105 and PO Box  
(Owner's residence or place of business or owner's address on building permit or otherwise as per California Civil Code Section 8174)  
on this date: March 11, 2019 Signed at Alameda, County of Alameda  
(Month/Day/Year) (City, County of person making service)  
on this date: March 11, 2019  
(Month/Day/Year) (Signature of person making service)  
99730, Sacramento, CA 95899

**ALTERNATIVE PROOF OF SERVICE AFFIDAVIT**  
California Civil Code Section 8416 (a)(7), (c)(2)

Use this Alternative Proof of Service Affidavit if the owner or reputed owner cannot be served per California Civil Code § 8416 (c)(1), as specified above. Note: You may also use this Alternative Proof of Service if you have served the owner or reputed owner as specified above and also want to serve the construction lender and/or original contractor as an additional measure.

I, \_\_\_\_\_, declare that the owner or reputed owner of the property specified in the enclosed MECHANICS LIEN and NOTICE OF MECHANICS LIEN could not be served by Registered Mail, Certified Mail, or First Class Mail, evidenced by a certificate of mailing, postage prepaid as specified in California Civil Code § 8416 (c)(1) [or that I am also serving the Construction Lender and/or Original Contractor as an additional measure]. Therefore, pursuant to California Civil Code § 8416 (c)(2), I served a copy of the enclosed MECHANICS LIEN and NOTICE OF MECHANICS LIEN by Registered Mail, Certified Mail or First Class Mail, evidenced by a certificate of mailing, postage prepaid, addressed to the construction lender \_\_\_\_\_ at the following address:  
(Name of construction lender)  
\_\_\_\_\_ and/or to the  
(Construction lender address)  
original contractor \_\_\_\_\_ at the following address:  
(Name of original contractor)  
\_\_\_\_\_  
(Original contractor address)  
on this date: \_\_\_\_\_ Signed at \_\_\_\_\_  
(Month/Day/Year) (City, County of person making service)  
on this date: \_\_\_\_\_  
(Month/Day/Year) (Signature of person making service)

